UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

MAXIM LEVIN and VODKA PROPERTIES, LLC,

Plaintiffs,

Civil Action No.: 20-cv-1511

-vs.-

CITY OF BUFFALO, et al.

Defendants.

CITY DEFENDANTS' NOTICE OF MOTION TO ENLARGE TIME TO COMPLETE DISCOVERY AND ENLARGE THE CASE MANAGEMENT ORDER

Upon the annexed Declaration of Robert E. Quinn, dated January 18, 2022, Defendants, CITY OF BUFFALO, BYRON W. BROWN, JAMES COMERFORD, JR., LOU PETRUCCI, TRACY KRUG, and KEVIN COYNE ("City Defendants"), by and through their attorney, Cavette Chambers, Esq., Acting Corporation Counsel for the City of Buffalo, move this Court pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure for an enlargement of time to complete discovery and to enlarge the existing Case Management Order in the above captioned matter.

Dated: January 18, 2022 Buffalo, New York

CAVETTE A. CHAMBERS, ESQ. Acting Corporation Counsel

/s/Robert E. Quinn

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